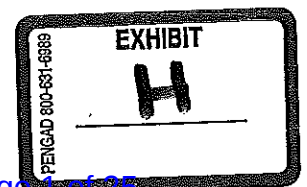


**TERRY HADEN**



1 Q. And did you have any other conversations  
2 regarding Monica between this meeting and what you  
3 have termed as the second meeting?

4 A. Just like I told you before, various things  
5 of, "Why do you let her talk to you that way? You're  
6 the boss, why can't you be the boss?"

7 Q. And what would he say?

8 A. He just kind of shrugged his shoulders and  
9 say, "Well, she gets her work done."

10 Q. Was Monica a good worker; do you know?

11 A. Monica was a good worker when Monica chose  
12 to be a good worker.

13 Q. And then you had a period of these  
14 conversations where, basically -- I don't want to --  
15 how would you term your conversations with Mike  
16 again, up until the second meeting?

17 A. Basically the same thing. And a lot of  
18 times they were in front of Monica.

19 Q. And then there was a second meeting; is that  
20 correct?

21 A. Well, apparently yes. Right there.

22 Q. Well, you say apparently?

23 A. I didn't recall that meeting until you  
24 brought that up.

25 Q. Okay. And then what was that meeting?

1 swinger-style sex ring out of the Texas County  
2 Prosecuting Attorney's Office and the Texas County  
3 Associate Court Office to the humiliation and  
4 detriment of Michael R. Anderson. Did you supply any  
5 information to Mr. Anderson, prior to him filing his  
6 lawsuit on May 31, 2006, as to the truth of the  
7 allegations in Paragraph 4-F?

8 A. No, I did not.

9 Q. Okay. Let me ask -- let me back up for a  
10 second. When did you start work for Mr. Eidson?

11 A. October of 1999.

12 Q. And when did Mike Anderson and Monica move  
13 into the Texas County Prosecutor's Office?

14 A. January 1st, when he took office. I don't  
15 remember what year that was.

16 Q. And at that time you were here in this  
17 office next door --

18 A. Yes, I was.

19 Q. -- working with Mr. Eidson; is that correct?

20 A. Yes, I was.

21 Q. What were the office hours of the  
22 Prosecuting Attorney's Office, if you recall?

23 A. 8:00 to 5:00, unless Monica decided she  
24 needed to leave early or come in late.

25 Q. And how did that happen; do you know?

1 A. How did what happen?

2 Q. How did she -- how many times or what -- how  
3 regular was it that she would come in late or leave  
4 early?

5 A. A lot.

6 Q. And do you have any information as to  
7 whether she lied on her pay records or anything when  
8 she did that?

9 A. I don't have any idea about her pay records.

10 Q. Okay. What I'm trying to ask is whether you  
11 have any information that she tried to defraud the  
12 county or the state with any of her leavings and  
13 goings?

14 A. I have no idea.

15 Q. Okay. And then you haven't indicated that  
16 to Mr. Anderson; is that right?

17 A. No.

18 Q. Okay. Let's go off record for a second so I  
19 can find --

20 MR. WATERS: The current time is  
21 12:04. We're now going off record.

22 (Off the record.)

23

24 (Back on the record.)

25 MR. WATERS: We're now back on record.

1 Q. And when was that?

2 A. Like I said, before all of this started. I  
3 can't tell you exactly a date. It was before all of  
4 this started.

5 Q. And did you ever discuss that with Mr.  
6 Anderson?

7 A. About them having sex in the office?

8 Q. Yes.

9 A. No.

10 Q. Have you ever had any conversation with  
11 Corporal Kinder about this?

12 A. No.

13 Q. Have you ever talked to your husband about  
14 whether he's had a conversation with Corporal Kinder  
15 about anything?

16 A. No.

17 Q. Have you ever had a conversation with Monica  
18 about Corporal Kinder?

19 A. Several.

20 Q. And when was that?

21 A. The first one, and I don't remember the  
22 exact date, was when she was supposedly going to St.  
23 Louis to have a blind date with one of Chris  
24 Swatosh's friends. She didn't feel comfortable going  
25 up there alone, so she invited me. On the way up

1           there, she told me that she had been having an affair  
2           with Jeff Kinder for about two years.

3           Q.   And you can or can't tell me the date?

4           A.   I can't tell you the date on this.  I know  
5           that Jeff and Curtis were going up for --  
6           surprisingly up to the same town, at the same hotel  
7           that we were at, that Monica had made arrangements  
8           for us to stay at.  She told me they'd been having an  
9           affair for about two years and that she didn't feel  
10          comfortable discussing it with me until then because  
11          she knew that I was friends with Jeff's wife, Kelly.

12          Q.   And what did you say?

13          A.   Probably something like, "Oh, my God, what  
14          the hell are you thinking?"

15          Q.   And who else have you told about this  
16          conversation?

17          A.   I told my husband about this conversation  
18          after it all blew up.

19          Q.   When you say, "After it blew up," what  
20          period of time would you be talking about?

21          A.   After the whole swinger-style sex ring blew  
22          up and --

23          Q.   The lawsuit that made the allegations?

24          A.   Yes.

25          Q.   Anybody else?

1           A. Oh, probably. She was very blatant about  
2 her sex life. She talked about her sex life all the  
3 time in the office.

4           Q. My question is, whether you had any  
5 conversations without Monica there about -- which I  
6 should have made clear -- with Mr. Anderson,  
7 Christie, or Stephanie about Monica Daniel Hutchison  
8 and her sex life.

9           A. Stephanie and I had a conversation about a  
10 sexual relationship that she had had with Monica.  
11 Christie and I traded notes on what Monica had said  
12 to us about her sex life, because she tends to not be  
13 extremely truthful about things and tells one person  
14 they're the only person that knows, and tells another  
15 person they're the only person that knows. I  
16 remember when Mike found out about the relationship  
17 between Jeff Kinder and Monica.

18          Q. And when was that?

19          A. I'd say in between the time that -- the  
20 first time she didn't work there and the second time  
21 she didn't work there.

22          Q. Okay. So that I understand -- and I want to  
23 get this -- there is a specific incident that  
24 occurred.

25          A. Yes, there is.

1 Q. Where Mike found out about Jeff Kinder and  
2 Monica's relationship?

3 A. Yes.

4 Q. And that is between the first time she left  
5 and her coming back; is that correct?

6 A. Yes.

7 Q. And tell me about that incident.

8 A. Monica called the office, called up here and  
9 went off on me and totally blew because she thought  
10 that I had told Mike that she had had an affair with  
11 Jeff Kinder, which wasn't true. I did not have a  
12 conversation with Mike before that time. I did not  
13 have a conversation with Mike about her relationship  
14 with anybody at that time because I didn't want to be  
15 involved in it.

16 Q. And so, then, tell me about Mike finding  
17 out.

18 A. I have no idea how Mike found out.

19 Q. Oh, I thought you said this was an incident  
20 -- oh, okay, I see what you're saying.

21 A. I still to this day have no idea how Mike  
22 found out. All I know is, it didn't come from me.

23 Q. And this phone call was after she had left  
24 and before she came back; is that right?

25 A. While she was still working down there. I



1 A. Well, I'm 38 now. 33 years. 34 years.

2 Q. Would it be correct to say that the two of  
3 you grew up together?

4 A. Yes.

5 Q. Did you ever live with Monica?

6 A. Yes.

7 Q. When was that?

8 A. Oh, gee, around 1997, 1998.

9 Q. Was this after she got divorced from her  
10 first husband?

11 A. Yes.

12 Q. Explain to the ladies and gentlemen of the  
13 jury, if you would, during the time that you lived  
14 with her and after her divorce, did her behavior  
15 change or her attitude change?

16 A. Drastically.

17 Q. How so?

18 A. Monica's husband had cheated on her for two  
19 years and Monica felt it was her purpose in life to  
20 prove that any man, given the right circumstances,  
21 would cheat on his wife. And she felt it was her  
22 personal obligation to prove that to herself.

23 Q. Is this something that she actually said to  
24 you?

25 A. On several occasions.

1 Q. Now, during this time that you were living  
2 together, did she engage in some type of relationship  
3 with a highway patrolman during that period of time?

4 A. Yes, she did.

5 Q. Who was that?

6 A. Shawn Wood.

7 Q. Did that relationship with Mr. Wood or  
8 Officer Wood end poorly for Monica?

9 A. Yes. They're friends again now, as far as I  
10 know. But, yes, their relationship ended badly.

11 Q. Did she make any kind of allegations against  
12 Officer Wood?

13 A. Yes, she did.

14 Q. What type of allegations did she make  
15 against Officer Wood?

16 A. That he was stalking her.

17 Q. Now, once Monica came to work for Mike --  
18 and we'll start back when she started working for  
19 Mike in his private law office -- would you have  
20 occasion to be at Mr. Anderson's private practice  
21 from time to time and see how Monica interacted with  
22 Mr. Anderson at the private law office?

23 A. Yes.

24 Q. And then, of course, once they became -- or  
25 once Mr. Anderson became prosecutor, you would

1 interact with Monica and Mr. Anderson at the  
2 prosecutor's office. Would that be a fair statement?

3 A. Yes.

4 Q. Up until this conversation you had with  
5 Monica in December of 2005, after Mike had come to  
6 her house, did she ever mention to you anything about  
7 Mike sexually harassing her?

8 A. Oh, she'd call him a pervert, but that was  
9 just because he would make comments -- she would --  
10 she said that he would make comments that were  
11 inappropriate. Obviously, it didn't offend her too  
12 badly to where she quit. She had several  
13 opportunities to quit. She didn't have to go to the  
14 prosecutor's office. She chose to.

15 Q. But she never told you about anything Mr.  
16 Anderson specifically said or specifically did toward  
17 her that she felt were beyond the bounds of a normal  
18 working environment?

19 A. No.

20 Q. How did Mr. Anderson, from your observation,  
21 treat Monica?

22 A. Like a daughter.

23 Q. When you say "like a daughter," what do you  
24 mean? Can you describe for the jury what you mean by  
25 that?

1           A. He would give her money. She would get  
2 extremely huge bonuses, Christmas presents. Dianne  
3 would go out and buy her birthday presents, Christmas  
4 presents. It was like a family sort of relationship.  
5 I mean, her and Dianne were extremely close and her  
6 and Mike were close.

7           Q. How was Monica's behavior toward Mr.  
8 Anderson?

9           A. At first, it was okay. Then she would just  
10 kind of demean him, as far as calling him moron or  
11 telling him he was stupid or stuff like that.

12          Q. Now, this was things that she would say to  
13 Mr. Anderson?

14          A. Yeah.

15          Q. Would she ever say that to third parties, or  
16 did you ever observe her say that to third parties?

17          A. She said it to me a million times. She said  
18 it to several of our friends.

19          Q. Did you ever see her say it to a member of  
20 the public, other than say a legal secretary or  
21 something like that?

22          A. Yeah. But, then again, we all gripped about  
23 our bosses. Sorry.

24          Q. Well, you'll get a bill for his time.  
25 When Mike decided he was going to run for prosecuting

1 Q. How did Monica get along with the other  
2 staff members at the office once they came on board?

3 A. At first it was okay, but there was an  
4 instance where Christie got a raise and Monica didn't  
5 and she would throw a little tantrum. Mike bought  
6 her a dog.

7 Q. Now, you said she threw a little tantrum.  
8 Did she ever talk to you about that incident with  
9 regard to the raise?

10 A. Yeah, she felt that she deserved a bigger  
11 raise than Christie did and that Christie didn't  
12 deserve a raise. Even though the State was  
13 compensating Christie's wages, Monica felt that she  
14 should be making more money than anybody in the  
15 office.

16 Q. And did her attitude to Mike change after  
17 that occurred?

18 A. Yes.

19 Q. How did it change?

20 A. She became even more belligerent towards  
21 him. She would threaten to quit. He would talk her  
22 out of it or buy her a little trinket or whatever and  
23 --

24 Q. Now, as I understand it, you married Curtis  
25 Haden in the fall of 2002; is that correct?

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A. Yes.

Q. And he was a highway patrol officer?

A. Yes.

Q. How did Monica behave toward the highway patrol officers that would come into the prosecutor's office?

A. Inappropriately, as far as I'm concerned.

Q. Explain to the folks on the jury what you mean by that.

A. She would hit on them. She would flirt with them. That kind of went back to the, "I'm going to prove to myself and everybody else that every man will cheat."

Q. Once you got married, would you let your husband go down there to the prosecutor's office?

A. Would I let my husband go down there? It was part of his job to go down there. If I felt he was down there too long, I would go down there just to kind of let him know, okay, time's up, buddy. Did I trust her around my husband? Hell, no.

Q. And why was that?

A. Because she hit on everybody in front of me, what was to make me think she wasn't hitting on my husband?

Q. Now, let's fast forward to December of 2005,

1 and evidence will establish there was an incident  
2 where Monica left the prosecutor's office, then came  
3 back, and then left again. Did Monica talk with you  
4 at all about why the first parting of ways occurred?

5 A. Yeah. She said basically that Mike told her  
6 to knock her crap off as far as with the officers and  
7 with a certain officer in particular or he was going  
8 to fire her.

9 Q. And is that officer Sergeant Kinder?

10 A. Yes.

11 Q. Now, is Sergeant Kinder your husband's own  
12 sergeant?

13 A. Yes, he is.

14 Q. And then did you ever discuss with Monica  
15 her coming back to the prosecutor's office?

16 A. Yeah.

17 Q. What did she tell you about why she came  
18 back?

19 A. She was building a case.

20 Q. Did she use those specific words?

21 A. I can't remember what words she specifically  
22 used, but it was quite clear she was building a case  
23 and getting things off her computer.

24 Q. You say, getting things off of her computer.  
25 Do you know what she was getting off her computer?

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A. No, I do not.

Q. How do you know that she was doing that?

A. There were things missing off her computer, different forms and stuff like that when Christie took over. She was extremely upset because she was no longer the office manager when she came back. Christie had been promoted to the office manager. She was just an employee.

Q. Now, did you continue to speak with Monica when she came back to the prosecutor's office?

A. Yes

Q. And then the incident occurred at her home with Mr. Anderson coming to her house, and you said she talked to you about that. Is that correct?

A. Yes.

Q. And she called you the morning after it happened; is that right?

A. Yes.

Q. She played the tape for you?

A. Yes.

Q. Do you know, did she play the tape for anybody else?

A. I have no idea.

Q. Did you hear anything on that tape that you thought was sexual in any way?



1 about the file.

2 Q. You never saw the file?

3 A. No.

4 Q. Where was it that it was supposed to have  
5 been kept

6 A. Under a floorboard in the living room.

7 Q. Of her home?

8 A. Yes.

9 Q. Did she actually take you to the spot and  
10 say, "It's under here."

11 A. Yes.

12 Q. Now, would Monica discuss her sex life with  
13 you?

14 A. Yes.

15 Q. Would she discuss it with the other girls in  
16 the office?

17 A. Yes.

18 Q. Did you ever see her ask either Christie or  
19 Stephanie to expose their breasts in the office?

20 A. I don't believe I ever saw or heard that.  
21 They told me about it.

22 Q. What did they tell you?

23 A. Just that it made them uncomfortable.

24 Q. Tell the jury specifically what they told  
25 you that Monica had requested of them, or what she

1 A. Yes.

2 Q. And was there some supposed Quid pro quo,  
3 this for that thing there?

4 A. She was supposed to spend the night before  
5 her bankruptcy hearing in Springfield with him. She  
6 chickened out.

7 Q. Did she tell you that specifically?

8 A. Yes.

9 Q. Did you ever -- we talked about the flirting  
10 with officers and things that would come in. Did you  
11 ever observe her touch any officers in inappropriate  
12 ways in the office of the Prosecuting Attorney?

13 A. Explain what you mean by "inappropriate,"  
14 please.

15 Q. Did you ever see Monica touch them in a way  
16 that would be sexually suggestive?

17 A. Yes.

18 Q. How so? Explain what you saw.

19 A. Grab their ass. Rub their arms. Give them  
20 hugs. Give them intimate hugs.

21 Q. Now, did Monica ever tell you about having  
22 any kind of sexual relationships with anyone in the  
23 prosecutor's office?

24 A. No.

25 Q. Did she ever discuss with you sexual

1 relationships with members of law enforcement?

2 A. Yes.

3 Q. Who did she tell you that's in law  
4 enforcement in Texas County that she had had  
5 relationships with?

6 A. Jeffrey Kinder, McNew, Officer McNew from  
7 Licking, and Officer Seth Walker.

8 Q. And at the time that she was having the  
9 relationship with Sergeant Kinder, was he married?

10 A. Yes.

11 Q. What about Chief McNew, was he married?

12 A. Yes.

13 Q. Did you understand from Monica that she was  
14 having relationships with both Sergeant Kinder and  
15 Chief McNew at the same time?

16 A. Not in a threesome sort of way. What do you  
17 mean at the same time?

18 Q. No, just during the same period of time.  
19 Under the same calendar period.

20 A. Yes.

21 Q. She told you that she was having  
22 relationships with both of them during those time  
23 periods?

24 A. Yes.

25 Q. And with regard to Seth Walker, what is it

1 she told you about her relationship with Mr. Walker?

2 A. I actually called her on that one. She had  
3 a threesome with Seth Walker and with Chief McNew.

4 Q. Did she admit to that?

5 A. Yes.

6 Q. And that was during the time that she was  
7 working at the Prosecuting Attorney's Office;  
8 correct?

9 A. Yes.

10 Q. Did she tell you where that occurred?

11 A. No.

12 Q. What's your relationship with Monica now?

13 A. I have no relationship with Monica now.

14 Q. Would you explain to the ladies and  
15 gentlemen of the jury why it deteriorated?

16 A. Because she kept trying to stir trouble for  
17 everybody else, whether they were involved in this or  
18 not. The last straw was when she called here and  
19 told me about a rumor about another officer and a  
20 secretary, a clerk at Licking City Hall, and I called  
21 her on it and told her she needed some psychological  
22 counseling, to stay away from my family and me and  
23 never speak to me again.

24 Q. You said you told her she needed  
25 psychological counseling?

1 A. Yes.

2 Q. Why did you think that that was the case?

3 A. I've been telling her for years she needed  
4 help because she felt that she needed to prove to  
5 herself and to everybody else that every married man  
6 will cheat, and that's just wrong. It's sick. Her  
7 divorce really messed her up. She was a totally  
8 different person after she found out her husband had  
9 cheated on her. It messed with her mind.

10 Q. I believe in response to Mr. Steelman's  
11 questions, you said that on the morning after Mike  
12 had been to her house, you went out there and she was  
13 acting upset and acting like she was afraid. Did you  
14 believe that she was genuinely upset or afraid of Mr.  
15 Anderson?

16 A. I believe she was pissed off. As far as  
17 that goes, I don't believe she's ever been afraid of  
18 Mike. I don't believe that she has ever been -- I  
19 can't think of the exact word -- humiliated by  
20 anything Mike has done, or by anything anybody has  
21 done or said to her. She's a very sexually-oriented  
22 person.

23 Q. Did you ever -- well, let me back up and  
24 rephrase. Mr. Steelman showed you the damage  
25 complaint that Mr. Anderson filed marked as

1           formed over your thirty-plus-year history with her?

2           A.   Yes.

3           Q.   Prior to this lawsuit ever happening, did  
4           Monica have a reputation in the community for  
5           chastity or promiscuousness?

6           A.   Yes.

7           Q.   What was that reputation?

8           A.   Well, she had to move from Houston to  
9           Licking because she had had affairs with married men.  
10          And she basically moved to Licking to get away from  
11          her reputation in Houston and pretty much left me and  
12          Loret to clean up the mess.

13          Q.   Now, she obviously, you said, admitted that  
14          she had had this threesome with Chief McNew and Seth  
15          Walker. Did she ever admit to having any other  
16          threesomes?

17          A.   Yes.

18          Q.   What other threesomes did she tell you about  
19          that she had been engaged in?

20          A.   Stephanie and Carl Creek and Millie.

21          Q.   And who else?

22          A.   Millie.

23          Q.   Was it your understanding that that had  
24          occurred during the time that she was working at the  
25          Prosecuting Attorney's Office?

1 A. Yes.

2 Q. Anyone else that she told you she had had  
3 threesomes with?

4 A. No.

5 MR. HARRIS: I believe that's all the  
6 questions I have.

7  
8 EXAMINATION BY MR. FRANKLIN:

9 Q. Good afternoon, Ms. Haden. I know it's been  
10 a long go of it. I don't have a ton of questions. I  
11 think Mr. Steelman and Mr. Harris have covered a lot  
12 of the information that I had, but I do have some  
13 questions. You mentioned an occasion when your  
14 assistant joined Ms. Hutchison and some staff members  
15 of the prosecutor's office at a strip club called Big  
16 Louie's.

17 A. Uh-huh, yes.

18 Q. Is that the only occasion during the time  
19 that Monica was employed in the prosecutor's office  
20 that she made a trip to Big Louie's that you are  
21 aware of?

22 A. No. I think they made at least two trips to  
23 Big Louie's, the same group of girls.

24 Q. Was it your -- in your experience in your  
25 relationship with Monica Hutchison, would she

1           A. I didn't participate in any of that and I  
2           can't testify as to whether anybody else did because  
3           I don't know.

4           Q. Okay. Do you recall any occasions at any of  
5           these cookie parties when Monica Hutchison exposed  
6           herself to any of her guests?

7           A. We all exposed ourselves, I mean -- as far  
8           as flashing and stuff like that, we changed clothes  
9           in the same room. I mean, it's just -- like I said,  
10          nothing much humiliated us. We were all females.

11          Q. Do you remember having any conversations  
12          with Monica Hutchison regarding the Hale divorce  
13          trial?

14          A. Oh, yeah.

15          Q. How many discussions did you have with  
16          Monica regarding the Hale divorce trial?

17          A. We had several discussions. Too many to  
18          name about the Hale divorce.

19          Q. What was the subject matter of those  
20          discussions?

21          A. Whether or not Monica was going to have to  
22          testify as to whether she had a sexual relationship  
23          with Misty Hale.

24          Q. Okay. What did she tell you about her  
25          intentions should she be called as a witness?



1           A. She would never admit to having a sexual  
2 relationship with Misty Hale.

3           Q. Why was that?

4           A. Because she didn't want to admit to it. She  
5 didn't want it on the record that she had had a  
6 sexual relationship with Misty.

7           Q. Okay. To your knowledge, was she called to  
8 testify in the divorce?

9           A. Yes.

10          Q. Were you present?

11          A. No, I was a witness.

12          Q. You were a witness?

13          A. I was another witness. I was not present  
14 when Monica testified.

15          Q. Are you aware of how she testified in that  
16 trial?

17          A. No, I'm not. The transcript is in the other  
18 room, I'm sure.

19          Q. What was the subject matter of your  
20 testimony at that trial?

21          A. You know, I really don't recall. I remember  
22 there was an instance where David Neal was trying to  
23 get me to testify as to Misty's behavior when she was  
24 a designated driver, and I kept telling him I was to  
25 drunk too remember. That kind of makes me sound like